

1 ISMAIL J. RAMSEY (CABN 189820)
 United States Attorney
 2 PAMELA T. JOHANN (CABN 145558)
 Chief, Civil Division
 3 ELIZABETH D. KURLAN (CABN 255869)
 Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36055
 5 San Francisco, California 94102-3495
 Telephone: (415) 436-7298
 6 Facsimile: (415) 436-6748
 Elizabeth.Kurlan@usdoj.gov

7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

12 RAHEL WOLDEMARIAM,

13 Plaintiff,

14 v.

15 EMILIA BARDINI, Director of the San
 Francisco Asylum Office, *et al.*,

16 Defendants.

C 3:24-cv-06583-LJC

**STIPULATION TO STAY PROCEEDINGS;
~~PROPOSED~~ ORDER**

18 The parties, through their undersigned attorneys, hereby stipulate and respectfully request the
 19 Court to stay proceedings in this case for a limited time, until May 14, 2025. The parties make this joint
 20 request because they are pursuing an administrative resolution that may render further litigation of this
 21 case unnecessary.

22 1. Plaintiff filed this mandamus action seeking adjudication of her Form I-589, Application
 23 for Asylum and for Withholding of Removal. United States Citizenship and Immigration Services
 24 (“USCIS”) has scheduled the asylum interview to take place on January 14, 2025. USCIS agrees to work
 25 diligently towards completing adjudication of Plaintiff’s application, absent the need for further
 26 adjudicative action or unforeseen circumstances that would require additional time for adjudication.

27
 28 Stip to Stay Proceedings
 C 3:24-cv-06583-LJC

1 2. Plaintiff agrees to submit all supplemental documents and evidence no later than seven to
2 ten days prior to the interview, pursuant to USCIS policy. Plaintiff agrees that the failure to timely
3 submit this evidence may result in the rescheduling of the interview at no fault of USCIS.

4 3. If needed by Plaintiff or her dependent(s), Plaintiff shall bring her own interpreter to her
5 asylum interview. *See* [https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13)
6 [provide-interpreters-starting-sept-13](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13). Plaintiff recognizes that failure to bring an interpreter to her
7 interview may result in the interview being rescheduled at no fault of USCIS.

8 4. Upon receipt of USCIS' decision, Plaintiff agrees to voluntarily dismiss this case.

9 5. The parties agree to bear their own attorney fees and costs.

10 Accordingly, the parties stipulate and request that the proceedings in this case be stayed until
11 May 14, 2025, at which time the parties will file a joint status report with the Court. At that time, the
12 parties may request a further continuance of the stay of proceedings, dismissal of the litigation if
13 appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this
14 case will benefit the parties and conserve the Court's resources while the parties pursue a potential
15 administrative resolution.
16

17
18 Dated: November 22, 2024

Respectfully submitted¹,

ISMAIL J. RAMSEY
United States Attorney

/s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney
Attorneys for Defendants

19
20
21
22
23
24 //

25 //

26 //

27 _____
28 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed below concur in the filing of this document.

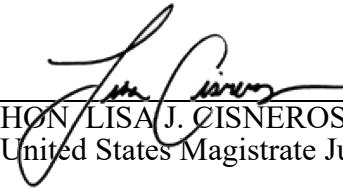
1 Dated: November 23, 2024

/s/ Charles Carr
CHARLES C. CARR
Murray Osorio PLLC
Attorney for Plaintiff

4 ~~PROPOSED~~ ORDER

5 Pursuant to stipulation, IT IS SO ORDERED.

8 Date: November 25, 2024


HON. LISA J. CISNEROS
United States Magistrate Judge

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28